LaValle, Diane 54011

DEPT. OF TRANSPORTATION
99 JUN 23 PM 1:46

From: Billings, Delmer
Sent: Tuesday, June 22, 1999 8:27 AM
To: LaValle, Diane; Coburn, Kevin
Subject: FW: Comments on Docket No. RPSA-99-5013(HM-229) -31

Importance: High

Comments

-----Original Message----:
From: Patrick_J._Student@NOTES.UP.COM [SMTP:Patrick_J._Student@NOTES.UP.COM]
Sent:' Monday, June 21, 1999 5:26 PM
To: Rules
cc: Searlesp@api.org; tmoses@spillcenter.com; mike-heimowitz@cmahq.com; Wormley, Patricia W.; namhazmat@maersk.com; robert.ahlborn@hlcl.com; mlyden@cl2.com; dworcester@igc.org; chilton@trucking.org; patrick.brady@bnsf.com; ttreiche@aar.org; paul_williams@aar.com; scamara@roadway.com; Kay-A._Houfek@NOTES.UP.COM; jfreeman@shiprps.com; Mike.Windsor@yellowcorp.com; MadarSA@aol.com; Harvison, Cliff; phil_marbut@cpr.ca; dlschoen@nscorp.com; stan_bradbury@cpr.ca; howard_elliott@csx.com; ouelle03@cn.ca; david.edington@bnsf.com; madesmedt@icrr.com; mike.l.carpenter@kcsr.com; rmayeaux@dps.state.la.us; MRush@aar.com
Subject: Comments on Docket No. RPSA-99-5013(HM-229)

Attached are the comment of the F5800.1Task Force. The task force is comprised of representation from A,erican Petroleum Inststute, American Trucking Associations, Inc., Association of American Railroads, Burlington Northern & Santa Fe Railway, Chemical Manufacturers Association, Chlorine Insitute, Inc., International Brotherhood of Teamsters, National Tank Truck Carriers, Reusable Industrial Packaging Association, Roadway Express, Spill Center, Inc., Union Pacific Railroad, and Yellow Freight Systems, Inc.

HM2291 .pdf

(See attached file: HM2291.pdf)

F5800 Task Force

Response to Questions
Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1

Docket No. RSPA-99-5013(HM-229)

Before answering the questions in this notice, the members of the F5800 task force would like to emphasize that improvements to reporting and changes to Form DOT F5800.1 are crucial to solve the non-accident release problem regardless of mode. Any change proposed by RSPA will entail changes to companies internal systems for collecting information necessary to execute a Form DOT F5800.1, as well as training of those persons collecting this information. Further, detailed instructions ~~to~~ on completing the new form are important with this change.

The task force throughout its deliberations recognized that their proposed changes would incur cost to their companies and industries, as well as the agency. The parties believe these cost are balanced by achieving a reporting system that provides better, and more detailed information relating to the causes of incidents. This in turn will allow development of better action plans to attack the root cause of the problems and bring about a reduction of incidents with corresponding reduction in cost.

General Issues

1. **Yes.** It is suggested the reporting requirements be amended to reflect the reporting party as the party who is in physical control of the activities at the time the release occurs. Specifically, the reporting requirements should be changed to read as follows:

> Each person shall report "each incident that occurs while a hazardous material is in its physical control during the course of transportation (including loading, unloading, and storage incidental to transportation)". By "person" the interested parties mean company, not the individual truck driver, train crew member, etc.

If this proposal is adopted by RSPA, a requirement for reporting will be placed on persons other than the carrier. RSPA should initiate a process to check that only one report is added to the database in the event both the carrier and the other person file a report on the same incident. Without this assurance, use of the database could be flawed, and corrective actions based on it could be wrong.

As there are other current dockets concerning jurisdictional issues, RSPA should maintain consistency of definitions among the various rulemakings.

2. Reporting undeclared shipments is outside the scope of this rulemaking. This is an enforcement and awareness issue. DOT and industry should discuss how we can work together to educate shippers and increase compliance with existing regulations.

Telephonic Notification

3. Property damage by itself should not trigger immediate reporting.

There are two reasons for this suggestion. First, the remaining triggers are left in place, e.g., §171.15(a)(1)(i), (ii), (iv), (v), and (vi). Second, property damage from similar incidents can vary widely, and as such there would be no consistency in reporting. Further, property damage is typically not determined until the incident is in the mitigation stage.

4. Other Federal laws require immediate notification. 49CFR171 .1 5 should be expanded to include these requirements.

42USC11004(b) requires immediate local notification of transportation incidents involving certain specified materials. It is recommended that RSPA adopt these requirements and broaden them to include all hazardous materials

The Department of Labor's section on hazardous waste operations and emergency response specifically states "[r]esponses to incidental releases of hazardous substances where the substance can be absorded, neutralized or otherwise controlled by employees in the immediate release area . .." are not considered emergencies. DOT should not consider such incidental releases emergencies requiring immediate notification, either.

It needs to be recognized that only one immediate call at a time can be made. It is recommended that a hierarchy of local, then NRC calls be established.

There are times in which the circumstances of the incident are such that the agency to whom an immediate notification would be made is already aware of the incident and, contacts the party responsible for making the notification seeking information on the incident. In this case the party responsible for making the local notification should not have to make a telephone call.

Immediate notification to states and localities is increasingly a problem for carriers. Most states require some notification, some to multiple entities. In

virtually every case, all jurisdictions want "immediate" notification. The issue of "one call" notification has been discussed in other forums, but to no avail (The Stakeholders Want Change: Report of a Meeting on Improving the System for Hazardous Materials Accident Safety, EPA, January 1995, page 1). We are not opposed to providing immediate notification of transportation-related hazardous materials incidents. However, those subject to the "immediate notification" requirements of §171 .1 5 should be relieved of redundant, additional, and conflicting non-federal immediate notification requirements.

While this is a new regulation, it will reduce the burden of the responsible parties by standardizing the reporting requirements.

5. Yes. Releases of materials poisonous by inhalation should require immediate notification.

6. No. The carriers represented on the task force indicated the offeror of the hazardous materials shipment may be contacted as a business practice anytime there is an incident involving the shipment, but do not believe this should be made a regulatory requirement.

7. The person making the written report should be the one required to make the immediate telephone call. There is a direct correlation between this question and Question number one (1). Consistency should be maintained in the reporting requirements. The task force believes that both telephonic notification and the written report should be handled by the party in physical control of the activities at the time of the release, since that party has the facts concerning the event.

Written Reports

8. No. The task force recommends the following as not subject to the reporting requirements:

> "Normally expected discharges" which occur during loading or unloading, including hose connecting and disconnecting operations; or
>
> Discharges of argon, nitrogen, oxygen, or carbon dioxide from regulating valves during transportation.

These two changes would further clarify those situations when reporting does not need to be made.

9. No. Information on hazardous materials shipments involved in accidents is presently required to be reported by modal regulations, Safety Net for

transportation by highway and FRA reporting under Part 225 of 49CFR for transportation by rail.

10. Yes. The exceptions in §171.16(c)(l) should be modified to include:

> Adhesives, coating solution, and resin solution, and
>
> Release of any class of materials in Packing Group Ill when shipped in a packaging of 20 liters (5.2 gallons) or less capacity for liquids; and for solids, a pail of 20 liters (5.2 gallons), and for other a packaging having a net capacity of 23 kilograms (50 pounds) or less.
>
> Notes: The capacity of 20 liters (5.2 gallons) is specified because this volume is becoming the nominally accepted "5 gallon" capacity packaging. This change should also be made in current §171.16(c)(iii).
>
> The recommendation for solids was derived from the values assigned to a non-bulk packaging for solids in 9171.8, mass of 400 kilograms (882 pounds) or 450 liters (119) gallons. 20 liters is 0.04444 of 450 liters. Using this ratio gives 17.7777 kilograms or 39.15 pounds. However, the common weight for a bag near that amount is 23 kilograms (50 pounds) or less and is recommended that proportional weight be raised to this amount. Liquids simply have a volume limit regardless of the weight of the material. For reference a 20 liter packaging of water has a net weight of 19.64 kilograms (43.30 pounds).

These exceptions would reduce the burden of reporting non-bulk packaging failures involving de minimis quantities with limited risk. Expanding the exception from paint and paint related material to include adhesives and resin solution that do not meet the definition of any other hazard class have the same hazards as paint or paint related material and are packaged in a similar manner.

Further, the present exception for paint and paint related material as a Class 8 material should be removed. Because of the familiarity with paint as a Class 3 material, workers may confuse the properties and consequently be injured.

11. Yes. The trigger should be dependent on the hazard of the material. The task force agrees that there should be a "trigger" quantity, but after extensive discussions could not suggest a "quantity" or "quantities".

DOT Form F 5800.1

12. Yes. A tiered approach should be utilized for incident reporting. All reportable

incidents should require a base or "census" form to be filed. A single form (draft attached, Attachment A) is proposed. The "census" form would include Sections I and V.

The base or "census" form would be used only for all transportation incidents, including those situations where a written report is required but there has been no release of hazardous materials. . In cases where a non-bulk package fails for reasons other than handling or from "improper" loading of it or other freight in a transport vehicle, and in all cases involving bulk transportation of hazardous materials, a longer, more descriptive form would be required. In addition to the reporting requirements presently found in §171 .1 6 (d)(l), (2), and (3); we recommend the addition of the following new requirements as additional triggers for the comprehensive report:

(1) Occurred as a result of a bulk or intermediate bulk container transportation accident or incident; or
(2) Involved the release of a material poisonous by inhalation.

The task force believes that by making this change RSPA will be reducing the burden of reporting by establishing a short form for low severity incidents.

13. Yes. The current form does not provide sufficient detailed data with respect to packaging information for non-bulk packages, and package failure information for bulk packages. We recommend that a system of numeric cause codes be developed specific to non-bulk and intermediate bulk packaging, cargo tanks, and tank cars. A preliminary list of cause codes is attached (Attachment B), but would require additional development, if our proposal is adopted. (The task force is willing to help the agency develop and define additional cause codes.) These cause codes would serve as a basis for causal analysis, which is an integral part of the development of corrective action plans and aid in reduction and prevention efforts.

With respect to the second part of this question, the task force believes there is no benefit in assigning specific human causal factors to hazardous material incidents. Although there is a degree of human failure involved in almost every hazardous material release, the intent of a cause code system, is not to assign blame or responsibility for the incident. Rather, the cause code system is intended as an analytical tool to provide a clearer understanding of the "root" cause of a given incident.

14. Yes. Replacing the existing check boxes with numerically coded responses could conceivably increase the difficulty and length of time it takes to complete the

written report. The burden created would be outweighed by usefulness of the data format for analytical purposes. It also has the added value of lending itself to electronic data submission.

15. Yes. Again, replacing the existing check boxes with numerically coded responses could possibly increase the difficulty and length of time it takes to complete the report. However, we believe the burden is far outweighed by the benefit of capturing more meaningful data.

Changes to these fields are necessary to allow shippers and carriers to understand the root cause of failures and implement improvements in packaging which will prevent future releases and reduce the potential for injury from exposure to a released hazardous material.

16. There are several reasons why actual amount is difficult, if not impossible to obtain. The task force recommends keeping the field giving the capacity of the package, and adding a field to indicate that the shipment was a residue according to 5171.8.

The offeror of a loaded bulk package shipment only has to give some indication of the quantity, e.g., 1 tank car, 1 cargo tank, §172.202(a)(5). A residue shipment is "the hazardous material remaining in a packaging including a tank car, after its contents have been unloaded to the maximum extent practicable, and is also covered under §172.202(a)(5). Further, thermal expansion of many commodities makes it difficult determine how much material was loaded in the package.

17. Yes. However, simply changing the titles of the columns is merely a first step. Further enhancement needed to this section is addressed in answer to Question 18.

18. Yes. There should be separate sections for reporting bulk and non-bulk packaging information.

Additionally there should be a separate section for reporting intermediate bulk container packaging information.

The present form lacks specificity of cause of failure. Separation of the information would provide a clearer, more concise, description of the specific areas of packaging failure. These changes are necessary to facilitate root cause analysis, implement improvements in packaging, and prevent future releases.

19. Yes. The key to this question is availability of information. Various task force

members have identified location identifiers that are of value from an analytical perspective. If available, the data should be reported, not mandated, as it is useful in risk management.

20. The existing form should be changed to allow for numerically coded responses. This, coupled with the changes identified in question 19, provides the ability to definitively determine the facts of a release.

21. Yes. The injury data should be updated if an injury becomes a fatality within one year of the incident.

No. With respect to the remainder of the sections identified, the task force does not believe that a majority of the hazardous material incidents reported would require updating because the quantities released are minimal. We feel the small percentage that would qualify does not warrant a regulatory requirement for updating.

22. This should be part of the narrative. The instructions for executing the form should contain guidance describing this as the period of time at which the release began or was discovered until the emergency phase is officially declared over.

23. This too should be part of the narrative and it may of necessity be general in nature. Collecting this type of information would delay mitigating the incident as well as exposing employees or responders unnecessarily. The typical response to the failure of a non-bulk packaging is to overpack the packaging.

24. As stated, “copies of photographs in your possession” could be a significant burden. Many incidents have literally hundreds of photographs taken in various formats, e.g., print, slide, digital or video; while others have none. Again, it is suggested that the instructions for executing the form should state that copies of photographs detailing the failure of the packaging, if available, should be filed with the form.

25. Yes. Information concerning the evacuation of the general public should be included on the incident report form. If an evacuation is ordered after the emergency has started, the narrative should contain a note of explanation as to the reason. If there was an evacuation with no release, only the “census” form should be executed.

26. Yes. Information concerning hospitalized and non-hospitalized injuries to employees, emergency responders, and non-employees should be included on the report form. This would alleviate the need for follow-up phone calls from the

DOT for this information. More specific information is required to be filed in the rail mode on form FRA F6180-55a – Railroad Injury and Illness Summary. Please see our response to question 28.

27. Yes. Packing Group information should be included on the incident report form. This data is used in the analytical process to track hazardous material releases and aid in prevention planning.

28. Yes. The rail carriers represented on the interested parties are required to report accident and injury information to the Federal Railroad Administration (FRA) on the following forms: FRA F 6180 - 55a - Railroad Injury and Illness Summary; FRA F 6180 - 54 - Rail Equipment Accident/Incident Report; and FRA F - 57 - Rail-Highway Crossing Accident/incident Report. These reports contain a unique identifying number that could be included in a specified field on the form DOT 5800.1. These reports should be available to the Department of Transportation via an internal communication mechanism. Carriers of other modes could report similar federal report numbers in this same field, if applicable.

29. Data and information from the incident report form is used as an analytical tool for the development of action plans designed to reduce hazardous material releases and as an aid in prevention planning. The following data fields are most frequently used: Date, location of release (city, state), shipper, origin (city, state), destination (city, state), proper shipping name (commodity), hazard class, package specification, and package failure.

Furthermore, the changes recommended in these comments will assist those companies that adhere to the principles of Responsible Care, an initiative designed to foster continuous improvement in environmental, health and safety practices, and track their performance under the Distribution Code. DOT's incident database serves as the basis for tracking implementation of and adherence to the Responsible Care@ Distribution Code by many chemical manufacturers and carriers.

30. Additional data that should be collected on the incident report form includes: Location: route/street/mile post/latitude & longitude/airport; EPA Manifest ID number; Residue (Y/N); Packing Group; Llmited Quantity (Y/N); Non-Bulk Accident Causes; Evacuation Data, Fatality & Injury information (hospitalized & non-hospitalized) for employees, emergency responders, and other non-employees; Accident Data: Rail Type; Package Failure: Cause Code, Fitting/Valve Manufacturer, Model Number; Non-Bulk Packaging Information; Bulk Packaging Information: Head Thickness, Shell Thickness, Design Pressure, and Material of Construction.

By requiring the EPA Manifest ID #, the requirement of filing a copy of the manifest should be deleted. This is necessary to facilitate electronic filing.

This data, too, is useful in risk management.

31. While we recognize that it may be beneficial and a time savings, we believe that having data directly available via the internet would be problematic and could promote fraud. Incident specific information should not be posted on the Internet until 30 to 60 days after the incident.

The task force believes that any unrestricted information that is made available via Internet be summary information, and non-specific as to shipper and/or carrier. An Internet user would need a DOT registered user ID and password to access more specific information. Such an approach would allow tracking similar to a FOIA request.

32. Electronic filing should be an option, not a requirement. As there is no commercially available computer package for creating a Form DOT F5800.1, RSPA should develop a standard to accept the information in one of the commercially available data base packages such as Access™ or Paradox™, or tab-delimited text.

Filing electronically could be either sending in a diskette, or attaching a file in an e-mail.

RSPA should implement the ability for a carrier to submit Form DOT F5800.1 by fax immediately and not wait for resolution of this docket.

33. If by this question, the agency means, a system to follow the form after it has been submitted to the agency, the parties see no need for such a system. Only one of the parties indicated, that they have been contacted by the agency one time to request a resubmission of reports, as the original filing had been unexplainably lost after receipt.

The task force members all indicate that they have internal tracking systems. After an incident, necessary information is developed in a timely fashion so the form can be filed within the regulatory time frame.

National Transportation Safety Board (NTSB) Recommendations

34. See answer to question 6.

35. See answer to question 9.

If you have any questions involving the comments or desire to contact the task force with regard to its offer to assist in developing cause codes and/or user instructions, peas contact 'Pat Student at 402-271-2345.

The undersigned, while agreeing with these comments in general, reserve the right to file additional comments in this docket.

Signatories

F5800 Task Force

Response to Questions
Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1

Docket No. RSPA-99-5013(HM-229)

American Petroleum Institute
1220 "L" Street, NW
Washington DC 20005
Contact: Prentiss Seales
202-682-8227

American Trucking Associations, Inc.
2200 Mill Road
Alexandria, VA 22314
Contact: Paul Bomgardner
703-838-1849

Association of American Railroads/
Transportation Technology Center
PO Box 11130
Pueblo, CO 81001
Contact: Paul Williams
719-585-1881

Burlington Northern & Santa Fe Railway
4200 Deen Road
Fort Worth, TX 76106
Contact: Pat Brady
817-740-7358

Chemical Manufacturers Association
1300 Wilson Boulevard
Arlington, VA 22209
Contact: Mike Heimowitz
703-741-5255

Chlorine Institute, Inc.
2001 "L" Street, NW
Washington, DC 20036
Contact: Mike Lyden
202-872-4732

International Brotherhood of Teamsters
25 Louisiana Avenue, NW
Washington, DC 20001
Contact: Scott Madar
202-624-6960

National Tank Truck Carriers
2200 Mill Road
Alexandria, VA 22314
Contact: Cliff Harvison
703-838-1960

Reusable Industrial Packaging Association
8401 Corporate Drive, Suite 140
Landover, MD 20875
Contact: Dana Worcester
301-577-6476

Roadway Express
1077 Gorge Boulevard
Akron, OH 44310
Contact: Susan Camara
330-643-6904

Spill Center, Inc.
100 Powdermill Road, Suite 223
Acton, MA 01720
Contact: Tom Moses
978-897-6461

Union Pacific Railroad
1416 Dodge Street
Omaha, NE 68179
Contact: Patrick Student or Kay Houfek
402-271-2345 or 402-271-3674

Yellow Freight Systems, Inc.
PO Box 7270
Overland Park, KS 66207
Contact: Mike Windsor
913-344-3057

Attachment A

F5800 Task Force
Response to Questions
Hazardous Materials: Revision to the
Incident Reporting Requirements and
the Detailed Hazardous Materials
Incident Report DOT Form F5800.1
Docket No. RSPA-99-5013(HM-229)

Note: The attached form is complete but for the ending bottom line.

DRAFT 2 DEPARTMENT OF TRANSPORTATION HAZARDOUS MATERIALS INCIDENT REPORT DRAFT 2

I. CENSUS INFORMATION

DATE AND TIME OF INCIDENT OR FINDING

REPORT ____ OF ____

DATE: _____ (Format MM/DD/CCYY) TIME: _____ (Format Military 'lime - 24 Hour Clock)

LOCATION

CITY: _____ STATE: _____ (Two letter alpha) COUNTY: _____

ADDITIONAL INFORMATION, IF AVAILABLE:
ROUTE OR STREET OR MILE POST OR LATITUDE & LONGITUDE OR AIRPORT _____

REPORTING PARTY (Name 8 address or reporting code, DOT census number, vessel name and ID number)

NAME: _____ CODE _____ OTHER **FEDERAL REPORTING** NUMBER _____

ADDRESS: _____ CITY/STATE _____

SHIPMENT INFORMATION

SHIPPER: _____ SHIPPING PAPER WAYBILL ID # _____

POINT OF ORIGIN
(City/State) _____

DESTINATION
(City/State) _____ EPA MANIFEST ID #
(If Applicable) _____

HAZARDOUS MATERIAL SPILLED OR INVOLVED

PROPER SHIPPING NAME _____ RESIDUE (Y/N) _____

HAZARD CLASS _____ (e.g. 3, 6.1, 8) IDENTIFICATION NUMBER _____ (e.g. UN2398,NA1987) PACKING GROUP _____ LIMITED QUANTITY (Y/N) _____

QUANTITY RELEASED (Specify Units e.g. gals.,lbs., etc.) _____ WAS A REPORTABLE QUANTITY OF A HAZARDOUS SUBSTANCE RELEASED (Y/N)? _____

RESULTS OF RELEASE (List All Applicable)

1 = SPILLAGE 2 = VAPOR (GAS) DISPERSION 3 = FIRE 4 = EXPLOSION 5 = ENTERED WATERWAY/SEWER
6 = ENVIRONMENTAL DAMAGE 7 = NO RELEASE, EVACUATION OF GENERAL PUBLIC 8 = NO RELEASE, MAJOR TRANSPORTATION ARTERY/FACILITY CLOSED
9 = NO RELEASE, OPERATIONAL FLIGHT PATTERN/ROUTINE OF AIRCRAFT ALTERED 10 = OTHER (DESCRIBE) _____

EVACUATION

GENERAL PUBLIC ONLY (Number) _____
DURATION (Hours) _____

FATALITIES (Number of Each)

EMPLOYEES _____
NON-EMPLOYEES _____
RESPONDERS _____

INJURIES (Number of Each)

	EMPLOYEES	NON-EMPLOYEES	RESPONDERS
HOSPITALIZED (Admitted Only)			
NON-HOSPITALIZED (Off Site First Aid: Observation, Released)			

MODE OF TRANSPORTATION _____

1 = AIR 2 = HIGHWAY 3 = RAIL
4 = WATER 5 = U.S. MAIL

TYPE OF VEHICLE _____

1 = CARGO TANK 2 = TANK CAR 3 = COVERED HOPPER 4 = TOFC/COFC 5 = OTHER RAIL CAR
6 = VAN TRUCK/TRAILER 7 = FLATBED TRUCK/TRAILER 6 = AIRCRAFT 9 = BARGE 10 = SHIP

TRANSPORTATION PHASE _____

1 = ENROUTE BETWEEN ORIGIN/DESTINATION 2 = LOADING 3 = UNLOADING 4 = TEMPORARY STORAGE

NON BULK ACCIDENT CAUSE **(COMPLETE ONLY WHEN PACKAGE FAILURE RESULTED FROM FORCES NOT NORMALLY INCIDENT TO TRANSPORTATION)**

SELECT A SINGLE CAUSE WHICH BEST DESCRIBES THE INCIDENT _____

1 = TRANSPORT VEHICLE ACCIDENT/DERAILMENT 2 = HEAVY FREIGHT LOADED ON TOP 3 = PUNCTURED BY TRAILER DEFECT 4 = PUNCTURED BY FORKLIFT
5 = PUNCTURED BY OTHER FREIGHT 6 = PUNCTURED BY OTHER TOOLS/EQUIPMENT 7 = LOADED AGAINSTARROWS 6 = DAMAGED BY FALLING FREIGHT
9 = VANDALISM 10 = LOADSHIFTED 11 = DROPPED/FELL/CRUSHED 12 = PUNCTURED BY NAIUPROTRUSION

NOTE: IF INCIDENT MEETS ANY OF THE CRITERIA DEFINED IN 49CFR 171 .16, COMPLETE ENTIRE FORM. IF NOT, GO TO SECTION V.

ACCIDENT DATA

WAS THE SPILL THE RESULT OF A VEHICLE ACCIDENT/DERAILMENT? (Y/N) _____
IF VEHICLE ACCIDENT, COMPLETE SECTIONS A, B, & C. IF DERAILMENT, COMPLETE SECTIONS A 8 D.

A. ESTIMATED SPEED (MPH)

B. HIGHWAY TYPE _____

1 = DIVIDED/LIMITED ACCESS 2 = UNDIVIDED
3 = DIVIDED NOT LIMITED ACCESS

C. TOTAL NUMBER OF LANES _____

1 = ONE 2 = Two
3 = THREE 4 = FOUR OR MORE

D. TRACK TYPE _____

1 = MAIN LINE, SINGLE TRACK 2 = MAIN LINE, DOUBLE TRACK
3 = SIDING 4 = YARD
5 = INDUSTRIAL/PLANT

II. PACKAGING INFORMATION

PACKAGE FAILURE

COMPLETE BELOW ONLY FOR FITTING AND/OR VALVE FAILURES

CAUSE CODE
(Required - See Appendix A)

FITTING/VALVE **MANUFACTURER (Brand)** _____

NON BULK PACKAGING INFORMATION

PACKAGE **SPECIFICATION/PERFORMANCE** MANUFACTURERS MARKINGS (INCLUDING THICKNESS) _____
(e.g. UN1 **A1/Y 1.2/150/97/USA/M0000/98 R** L 1.2/0.9/1.2)

IF NO **SPECIFICATIONS** OR MARKINGS AVAILABLE, **INDENTIFY**
TYPE AND MATERIAL OF OUTER PACKAGING

IF INNER PACKAGING, TYPE AND MATERIAL

I._____ I I . _____ III. _____ I. _____ II. _____

1 = DRUM
2 = WOOD BARREL
3 = **JERRICAN**
4 = BOX
5 = BAG
6 = COMPOSITE PACKAGING
7 = PRESSURE RECEPTACLE

A = STEEL
B = ALUMINUM
C = NATURAL WOOD
D = PLYWOOD
E = RECONSTRUCTED WOOD
F = FIBERBOARD
G = **PLASTIC**
H = **TEXTILE**
I = PAPER, **MULTIWALL**
J = METAL, OTHER THAN A OR B
K = **GLASS,PORCELAIN,** STONEWARE

a = OPEN HEAD
b = CLOSED **(TIGHT)** HEAD

1 = BOTTLE
2 = CAN
3 = BOX
4 = BAG
5 = CYLINDER

A = METAL (ANY TYPE)
B = GLASS, PORCELAIN, STONEWARE
c = **PLASTIC**
D = FIBERBOARD, CARDBOARD
E = WOOD, RECONSTRUCTED WOOD, **PLYWOOD**

CAPACITY OF OUTER PACKAGING _____

INTERMEDIATE BULK PACKAGING INFORMATION

CAUSE CODE
(Required - See Appendix A)

PACKAGE SPECIFICATION/PERFORMANCE MANUFACTURERS MARKINGS (INCLUDEING THICKNESS)

_____ _____ _____ _____

BULK PACKAGING INFORMATION

SERIAL **NUMBER/REPORTING** MARKS_____

PACKAGE SPECIFICATIONS_____

CAPACITY/WEIGHT _____
(e.g. load **capacity,tare,** gross)

EXEMPTION/APPROVAL/COMPETENT
AUTHORITY NUMBER, IF APPLICABLE (e.g. DOTE 1012)_____

COMPLETE BELOW FOR ACCIDENT RELEASE ONLY

HEAD
THICKNESS (units) _____

SHELL
THICKNESS (units) _____

DESIGN
PRESSURE (psig) _____

MATERIAL OF
CONSTRUCTION _____

III. ADDITIONAL INFORMATION

ESTIMATED DAMAGES (Show as dollars. Complete only when TOTAL damages exceed **$50,000)**

PRODUCT LOSS _____ CARRIER DAMAGE _____ PUBLIC-PRIVATE PROPERTY DAMAGE _____ DECONTAMINATION/CLEANUP _____

IV. DESCRIPTION OF INCIDENT

NARRATIVE DESCRIPTION OF THE INCIDENT Detailed description of what cause the incident and action taken to resolve the incident.

V. SUBMISSION INFORMATION

PERSON **REPORTING** INCIDENT

SIGNATURE

TITLE	TELEPHONE NUMBER INCLUDING AREA CODE	DATE REPORT SIGNED

Attachment B

F5800 Task Force
Response to Questions
Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1
Docket No. RSPA-99-5013(HM-229)

Sample Cause Codes

Non-Bulk & Intermediate Bulk Containers (IBC):

010 Forklift Punctured
011 Nail/Protrusion Punctured
012 Other Freight Punctured
013 Other Tool Punctured
014 Metal/Plastic Fatigue
015 Packaging Failure
016 Top Loaded Freight Crushed
017 Load Shift/Blocking and Bracing Failed
018 Load Shift/No Blocking and Bracing
019 Dropped/Fell
020 Fire/Heat Rupture/Burst
021 Freezing Rupture/Burst
022 Rubbing/Abrasion
023 Loose Lid/Bung/Closure
024 Vandalism
025 Container lining damaged/defective
026 Container jacket failed
027 Leaking at the vent due to problem with gasket
028 Leaking at bolted flange due to problem with gasket'
029 Leaking past threaded connections in vent
030 Leaking past threaded connections at relief valve
031 Leaking past threaded connections at gauges
032 Leaking at relief valve due to over pressure
033 Leaking at valve stem
034 leaking at valve seat
035 Leaking through packing
036 Manway leaking due to a problem with gasket
037 Manway leaking due to a problem with bolts
038 Leaking due to broken/defective vacuum relief valve
039 Vacuum relief valve leaking due to defective o-rings
040 Safety relief valve leaking past gasket connection to car

041 Safety relief valve leaking through valve seat/bent or broken stem
042 Safety relief valve leaking through valve seat/overloaded tank
043 Safety relief valve leaking as valve opens to release over pressure
044 Leaking due to defective/misaligned o-rings

045 Leaking due to broken/defective safety relief valve
046 Bottom outlet valve leaking past threaded cap
047 Bottom outlet valve leaking past threaded plug
048 Bottom outlet valve leaking directly out of valve stem
049 Bottom outlet valve cap gasket missing/defective
050 Bottom outlet valve securement/valve open
051 Top operated bottom outlet valve leaking due to loose packing gland nut
052 Slip tube gauging device securement/leaking at flange
053 Slip tube gauging device securement/leaking at base of fitting
054 Slip tube gauging device securement/leaking at packing gland nut
055 Slip tube gauging device leaking through packing
056 Slip tube gauging device securement/leaking at needle valve plug
057 Heater coils cap securement/leaking from inlet or outlet pipes
058 Heater coils leaking due to damaged coils
059 Tank leaking due to defective weld/seam
060 Tank leaking/product incompatible

Cargo Tanks

110 Leaking at the dome cover due to problem gasket
111 Leaking at the vent due to problem with gasket
112 Leaking at bolted flange due to problem with gasket
113 Leaking at product transfer hoses due problem with gasket
114 Leaking at product transfer pipes due to problem with gasket
115 Leaking at product transfer pump due to problem with gasket
116 Leaking at product transfer blower due to problem with gasket
117 Leaking past threaded connections in vent
118 Leaking past threaded connections in clean-out openings
119 Leaking past threaded connections at relief valve
120 Leaking past threaded connections at gauges
121 Leaking at relief valve due to over pressure
122 Leaking at product transfer device due to over pressure
123 Leaking due to burst frangible disk
124 Leaking at valve stem
125 leaking at valve seat
126 Leaking through packing
131 Vandalism

Tank Cars

211 Manway leaking due to missing gasket
212 Manway leaking due to misaligned gasket
213 Manway leaking due to deteriorated gasket
214 Manway leaking due to loose bolts
215 Manway leaking due to missing bolts
216 Manway leaking due to broken bolts
217 Fill hole cover leaking due to missing gasket
218 Fill hole cover leaking due to misaligned gasket
219 Fill hole cover leaking due to deteriorated gasket
220 Fill hole cover leaking due to loose bolts
221 Fill hole cover leaking due to missing bolts
222 Fill hole cover leaking due to broken bolts
223 Fill hole cover locking bar loose
224 Vacuum relief valve leaking past pipe threads
225 Vacuum relief valve leaking through valve under cap
226 Leaking due to broken/defective vacuum relief valve
227 Vacuum relief valve leaking due to defective o-rings
228 Vacuum relief valve bumped or damaged in an accident
229 Vacuum relief valve torn off in an accident
230 Vacuum relief valve leaking due to rollover in accident
231 Safety relief valve leaking past gasket connection to car
232 Safety relief valve leaking through valve seat/bent or broken stem
233 Safety relief valve leaking through valve seat/overloaded tank
234 Safety relief valve leaking as valve opens to release over pressure
235 Leaking due to defective/misaligned o-rings
236 Leaking due to broken/defective safety relief valve
237 Safety relief valve bumped or damaged in an accident
238 Safety relief valve torn off in an accident
239 Safety relief valve released due to rollover in accident
241 Safety vent leaking due to burst frangible disk
242 Safety vent leaking past application of vent to car
243 Safety vent leaking due to missing frangible disk
244 Safety vent leaking due to misapplied frangible disk
245 Safety vent leaking due to corroded frangible disk
246 Safety vent bumped or damaged in an accident
247 Safety vent torn off in an accident
248 Safety vent burst due to rollover in accident

251 Threaded liquid valve leaking where valve screws to car
252 Threaded liquid valve leaking past threaded plug
253 Threaded liquid valve securement/leak stops when valve is closed
254 Threaded liquid valve defective/leak continues when valve is closed
255 Threaded liquid valve leaking directly out of valve stem
256 Threaded liquid valve bumped or damaged in an accident

257 Threaded liquid valve torn off in an accident
261 Bolted liquid valve leaking where valve is bolted to car
262 Bolted liquid valve leaking past tapped flange on top of the valve
263 Bolted liquid valve securement/leaking leak stops when valve closed
264 Bolted liquid valve defective/leak continues when valve is closed
265 Bolted liquid valve leaking directly out of valve stem
266 Bolted liquid valve bumped or damaged in an accident
267 Bolted liquid valve torn off in an accident
271 Bottom outlet valve leaking at the blind flange
272 Bottom outlet valve leaking where nozzle bolts to valve
273 Bottom outlet valve leaking past threaded cap
274 Bottom outlet valve leaking past threaded plug
275 Bottom outlet valve leaking directly out of valve stem
276 Bottom outlet valve cap gasket missing/defective
277 Bottom outlet valve securement/valve open
278 Top operated bottom outlet valve leaking due to loose packing gland nut
279 Top operated bottom outlet valve leaking due to defective/missing gasket
281 Slip tube gauging device securement/leaking at flange
282 Slip tube gauging device securement/leaking at base of fitting
283 Slip tube gauging device securement/leaking at packing gland nut
284 Slip tube gauging device leaking through packing
285 Slip tube gauging device securement/leaking at needle valve plug
286 Magnetic gauging device leaking from base of device cover/broken pipe
287 Tape type gauging device securement/leaking between seal on device/manway cover plate
288 Gauging device bumped or damaged in an accident
289 Gauging device torn off in an accident
291 Sample line leaking where needle valve screws on pipe nipple
292 Sample line leaking where pipe plug crews into needle valve
293 Sample line needle valve securement/leak stops when valve is closed
294 Sample line needle valve defective/leak continues when valve is closed
295 Sample line leaking where pipe nipple screws into pressure head
296 Sample line leaking due to broken pipe nipple
297 Sample line leaking directly out of needle valve
298 Sample line bumped or damaged in an accident
299 Sample line torn off in an accident
301 Liquid line flange leaking at flange nuts
302 Liquid line flange leaking due to missing/defective gasket
303 Thermometer well cap leaking/damaged thermometer well pipe
304 Thermometer well cap leaking/missing or defective o-ring in cap
305 Thermometer well leaking between nipple and manway cover/damaged thermometer well pipe
306 Thermometer well leaking due to broken well nipple
307 Thermometer well bumped or damaged in an accident
308 Thermometer will torn off in an accident
309 Vapor valve bumped or damaged in an accident

310 Vapor valve torn off in an accident
311 Heater coils cap securement/leaking from inlet or outlet pipes
312 Heater coils leaking due to damaged coils
313 Washout leaking around seal between tank and washout plate
314 Washout leaking from plug in washout plate/tell-tale plug securement
315 Leaking at sump/defective or damaged sump
316 Bottom fitting bumped or damaged in accident
317 Bottom fitting torn off in accident
321 Tank leaking/jacketed car – cause undetermined
322 Tank leaking due to defective weld/seam
323 Tank leaking/rubber liner failed
324 Tank leaking/liner cracked/defective
325 Tank leaking/product incompatible
326 Tank leaking/head punctured or torn in accident
327 Tank leaking/shell punctured or torn in accident
328 Tank leaking due to stub sill separation from tank
329 Tank leaking due to parent metal crack or failure in shell
330 Tank leaking due to parent metal crack or failure in head
331 Tank explosion/BLEVE
341 Commodity self-ignited – initiating event
342 Commodity polymerized
343 Vandalism